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Attorneys for Defendant State Farm Fire
& Casualty Company

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

JOSHUA SHANKUS,

Plaintiff,

vs.

Case No. _____

STATE FARM FIRE & CASUALTY
COMPANY,

Defendant.

NOTICE OF REMOVAL

TO: UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ALASKA

This notice of defendant State Farm Fire & Casualty Company respectfully
shows:

HUGHES GORSKI SEEDORF
ODSEN & TERVOOREN, LLC
ATTORNEYS AT LAW
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SUITE 1001
ANCHORAGE, ALASKA 99503
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1. That on the 30th day of April, 2015, an action was commenced in the District Court for the State of Alaska at Anchorage, entitled *Joshua Shankus v. State Farm Fire & Casualty Company*, Case No. 3AN-15-06692CI. The jurisdictional limit of the Alaska District Court is \$100,000. Plaintiff's complaint alleges that the amount in controversy is in excess of \$100,000. Therefore, the amount in controversy is greater than \$75,000, exclusive of interest, costs and fees.

2. That this notice of removal is being filed pursuant to Title 28, United States Code § 1446(a) and (b) within thirty (30) days after receipt by defendants State Farm Fire & Casualty Company of the Summons and Complaint in the above-referenced action. Service of the Summons was accomplished on State Farm, via service on the Alaska Division of Insurance, on May 6, 2015.

3. This court has original jurisdiction of this action pursuant to Title 28, U.S.C. Section 1332(a), and this action may be removed to United States District Court pursuant to Title 28, U.S.C. Section 1441 and Section 1446(b), in that it is a civil action, the sum in controversy exceeds \$75,000, exclusive of interest and costs, and complete diversity exists between the parties to this lawsuit.

4. On information and belief, at the time this action was commenced, Plaintiff is domiciled in Alaska as alleged in the Complaint.

5. At the time this action was commenced, defendant State Farm Fire & Casualty Company was, and is, an insurance company organized under the laws of the State of Illinois, with its principal place of business in Bloomington, Illinois.

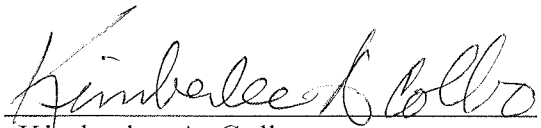
6. Defendant State Farm Fire & Casualty Company will pay all costs and disbursements incurred by reason of removal proceedings hereby brought should it be determined that this case is not removable or is improperly removed.

WHEREFORE defendant State Farm Fire & Casualty Company gives notice that this action formerly pending in the District Court for the State of Alaska, Third Judicial District at Anchorage is hereby removed to this court.

DATED at Anchorage, Alaska, this 1st day of June, 2015.

HUGHES GORSKI SEEDORF
ODSEN & TERVOOREN, LLC,
Attorneys for Defendant State Farm
Fire & Casualty Company

By:



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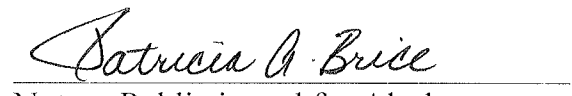
VERIFICATION

STATE OF ALASKA)
) ss.
THIRD JUDICIAL DISTRICT)

Kimberlee A. Colbo, being first duly sworn, deposes and states that she is the attorney for State Farm Fire & Casualty Company, defendant above named; that she knows the contents of this notice of removal and that the same are true and accurate to the best of her knowledge and belief; and that she voluntarily executed the foregoing notice of removal and was fully authorized to do so on behalf of State Farm Fire & Casualty Company.


Kimberlee A. Colbo

SUBSCRIBED AND SWORN TO before me this 1st day of June, 2015.


Notary Public in and for Alaska
My commission expires: 6-11-2015

I hereby certify that a true and correct copy of the foregoing was served via mail on the 1st day of June, 2015 on:

Russell Gordon Leavitt
8517 20th Street, Suite 330
JBER, AK 99506



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